

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
WESTERN DIVISION – SIOUX CITY**

PEG BOUAPHAKEO, et al and)	
on behalf of themselves and all other)	
similarly situated individuals,)	Docket No.: 5:07-cv-04009-JAJ
Plaintiffs,)	
v.)	
TYSON FOODS, INC.)	
(d/b/a TYSON FRESH MEATS, INC.))	
Defendant.)	

**NOTICE OF FILING MOTION FOR AWARD OF REASONABLE
ATTORNEYS' FEES AND EXPENSES**

IMPORTANT: Please Read This Notice Carefully.

PLEASE TAKE NOTICE that a motion for award of reasonable attorney's fees and expenses has been filed in this case and that a hearing on whether to approve such fees and expenses will be held at 12:00 p.m. on October 11, 2017 in the United States District Court located at 123 E Walnut Street, Des Moines, Iowa. This notice is being sent to you because you may be a member of the class of persons for whom a final judgment has been entered in this case against Tyson Foods, Inc. in the amount of \$5,785,757 for failure to pay overtime wages at its plant in Storm Lake, Iowa.

The purpose of this notice is to provide you the following information about this lawsuit:

1. The full amount of the judgment for \$5,785,757 will be paid to the employee class members for whom such judgment was entered. **There will be no reduction of that amount for attorney's fees or expenses.**
2. Any fees or expenses awarded to the attorneys for the class will be paid separate and apart from, and in addition to, the judgment that has been awarded to the members of the class. Such fees and expenses will have no effect whatsoever on the amount of backpay or damages that has been awarded to individual class members.
3. You do not need to do anything in order to receive the share of such judgment, if any, that the Court has determined you are entitled to receive. The amounts awarded to individual class members are fixed and final. The full judgment in the amount of \$5,785,757 will be automatically distributed by an administrator appointed by the Court without any requirement that you file anything in this case. Receipt of this notice, however, does not mean that you are one of the 2,523 class members that the Court has determined should be included in such payments. A list of the names of such 2,523 class members to be paid part of the class judgment can be found at _____. The Court will determine when individual shares of the judgment will be mailed to members of the class.

4. The motion for a separate award of reasonable attorney's fees and expenses is for work performed and expenses paid on your behalf by the attorneys who represented the class in obtaining such judgment. The Court will determine how much the attorneys will be paid. Itemization of the time spent, work done and hourly rates sought are on file with the Court and can be obtained from one of the attorneys for the class listed in paragraph 7 below. The motion for attorney's fees and expenses is based on more than 7,500 hours of work spent on behalf of the class and more than \$280,000 of out-of-pocket expenses. A fee award of \$4,526,425 is sought for such work and representation.

5. Any objection to the Court awarding attorney's fees or expenses for the work performed on behalf of the class must be filed on or before **October 10, 2017** at the United States Courthouse located at 123 E Walnut Street, Des Moines, Iowa or mailed in sufficient time to be received by October 10, 2017 at the following address.

Brown Greer, PLC
250 Rocketts Way
Richmond, VA 23231

For the Court to consider your objection, it must be in writing. Please write your objection on paper, being as specific and clear as possible.

6. You may also attend and participate in the hearing on the motion for attorneys' fees and expenses at **12:00 p.m. on October 11, 2017** at the courthouse address given above.

7. If you have questions or wish to receive further information about the work performed by the attorneys for the class or the reasonableness of the fees and expenses that they have asked the Court to approve, you may call or email such attorneys at the following:

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